



US EPA RECORDS CENTER REGION 5



MANUFACTURING DIVISION
100 N. MITSUBISHI MOTORWAY
NORMAL, ILLINOIS 61761
(309) 888-8000

September 7, 2012

Michelle Kerr, Remedial Project Manager
U.S. Environmental Protection Agency – Region 5
Superfund Division (SR-6J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

Re: Response to Information Request
Chemetco Facility in Hartford, Madison County, Illinois

Dear Ms. Kerr,

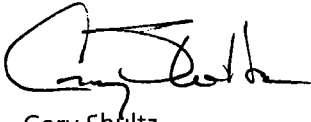
Enclosed please find the response of Mitsubishi Motors North America, Inc. to the Request for Information in the above referenced matter.

With regard to the response, it is necessary to understand the nature of the business of Mitsubishi Motors North America, Inc. (MMNA), the Manufacturing Division of which is located in Normal, McLean County, Illinois. This facility is MMNA's only manufacturing plant in the United States and its sole activity is the manufacture and assembly of automobiles, production having first begun in late 1988. A records search has been conducted and there is no information or record that indicates any communication or transaction between MMNA and Chemetco, in fact, neither the Chemetco name nor any of the warehouse names associated with the Chemetco inquiry can be found in any MMNA records searched except for the notices and inquiries of this current matter by the EPA. Furthermore, the subject material of the inquiry described in the Inquiry Enclosures, "...byproducts such as slag, zinc oxide (scrubber sludge), and spent refractory brick," "cadmium, copper, lead, and zinc..." are not waste byproducts of MMNA manufacturing and assembly processes and, therefore, MMNA has not been a source of the scrapped waste identified at Chemetco. MMNA does produce scrap, such as scrap steel from sheets stamped by presses which is sold under contract to companies that bale and reclaim the byproduct for regeneration of new steel. MMNA also produces liquid waste as a byproduct of coating and painting vehicles and general cleaning of the plant, which liquid is captured and waste concentrated in an onsite waste treatment facility, placed in appropriate barrels and disposed of through contracted waste companies. None of the MMNA contracted waste companies are found on your PRP list of companies, with one possible exception. MMNA sometime in the past may have supplied a nominal amount of otherwise undescribed medical waste from its on-site medical clinic to BFI Med-X, which may or may not be related to BFI Waste Services, shown on the PRP listing. Other incidental waste generated from MMNA's processes would include incoming parts packaging materials of cardboard and plastic,

food service waste from our cafeteria, office waste, etc., which is recycled, if possible, such as cardboard, paper, aluminum cans and glass, or landfilled, if not.

If you have or hereafter discover any documents or information to the contrary that identifies MMNA as a contributor to the Chemetco site, I would appreciate knowing about it so that we can investigate the source of our implication and respond accordingly.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Gary Shultz", with a stylized, cursive script.

Gary Shultz

Vice President and General Counsel

Enclosure

RESPONSE TO INFORMATION REQUEST

Re: Request for Information Pursuant to Section 104(e) of CERCLA regarding Chemetco, Facility in Hartford, Madison County, Illinois

1.
 - (a) Mitsubishi Motors North America, Inc. ("MMNA")
 - (b) R. Yorisue, President-Manufacturing Division
Mitsubishi Motors North America, Inc.
Manufacturing Division
100 N. Mitsubishi Motorway
Normal, IL 61761
 - (c) California, CT Corporation System
 - (d) Parent company: Mitsubishi Motors Corporation ("MMC")
 - (e) Assuming the inquiry refers to the parent company: MMC is not incorporated in the U.S.
 - (f) Parent company, MMC, is a Japanese corporation
2. MMNA denies it sent any material to Chemetco.
3. MMNA denies any role, duties or involvement at the Chemetco Site.
4. MMNA denies any activities in relation to the Chemetco Site.
5. MMNA denies it sent any material to Chemetco or to Chemetco warehouses.
6. MMNA denies it sent any material to Chemetco.
7. 1) through 3) MMNA denies it had any transactions with Chemetco.
8. MMNA denies it had any influence at the Chemetco Site.
9. MMNA denies it sent any material to Chemetco.
10. (a) through (e) MMNA denies it sent any material to Chemetco.
11. (a) through (g) MMNA denies it sent any material to Chemetco.
12. MMNA denies it sent any material to Chemetco.
13. MMNA denies it sent any material to Chemetco.
14. MMNA denies it sent any material to Chemetco.

15. MMNA denies it sent any material to Chemetco.
16. (a) and (b) MMNA denies it sent any material to Chemetco.
17. MMNA denies it sent any material to Chemetco.
18. MMNA denies it sent any material to Chemetco.
19. MMNA denies it sent any material to Chemetco.

Note: Responses to Inquiries 20. through 23. are limited to the period ending October, 2001

20. The following article is referenced:

[http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/9D98C38E83CD85D2852568E30046839E/\\$file/14277.pdf](http://yosemite.epa.gov/osw/rcra.nsf/0c994248c239947e85256d090071175f/9D98C38E83CD85D2852568E30046839E/$file/14277.pdf)

EPA530-R-98-005f
SUB-9224-98-006

3. Exemption for Scrap Metal Destined for Recycling Applies at Point of Generation
RCRA exempts from hazardous waste regulation scrap metal which is being recycled (40 CFR Section 261.6(a)(3)(ii)). In addition, RCRA excludes from the definition of solid waste, and thus the definition of hazardous waste, processed and certain other scrap metal being recycled (Section 261.4(a)(13)). A facility generates a scrap metal, which is not excluded under Section 261.4(a)(13), which exhibits the toxicity characteristic for lead (D008). The facility intends to send the scrap metal to a reclamation facility. Must the facility handle this scrap metal as a hazardous waste, including compliance with manifesting provisions, until the material is actually placed in the reclamation unit? The facility would not need to manage as hazardous waste scrap metal destined for reclamation which is not otherwise excluded under Section 261.4(a)(13) before placement in the reclamation unit, and would not need to manifest shipments of the material off site. Scrap metal that is intended to be reclaimed is exempt from Subtitle C regulation at the point of generation. However, the mere intent to reclaim the material is not adequate for it to remain exempt. If the material is not reclaimed (e.g., if it is speculatively accumulated per Section 261.1(c)(8)), the exemption does not apply and the material remains subject to all applicable hazardous waste regulations from the point of generation. Only if the facility ensures that the material will be reclaimed will the hazardous waste regulations not apply.

21. ILD982072357
22. I. Water
NPDES Permit IL00652068 - Monthly Reports. Sent to IEPA Division of Water Pollution Control, Compliance Assurance Section
II. Solid and Hazardous Waste
A. Illinois EPA Hazardous Waste Annual Report. Sent to IEPA Bureau of Land #24, Springfield IL62794-9276

B. Illinois EPA has reciprocity with USEPA, and submits copies to USEPA on bi-annual basis as required by Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The reports are submitted in odd years.... i.e. 2011, 2009, etc.

C. Illinois EPA Non Hazardous Special Waste Annual Report. Sent to IEPA Bureau of Land Planning and Reporting section (1996 to 1998), IEPA Solid Waste Section (1999 to 2002).

III. CERCLA/EPCRA

SARA Title II, Section 311 & 312 – Annual Report. Sent to Town of Normal Fire Chief, McLean County Emergency Service and Disaster Agency, Illinois Emergency Management Agency (Ruth Duncheon)

IV. TCSA

No reporting record.

V. SARA TRI

No reporting record prior to 2001.

23. Information requested is contained in 22., above.


24. MMNA does not believe that any person can provide a more detailed or complete response to any of the inquiries.

25. (a) through (e) MMNA's database of information concerning waste and scrap materials sent from the MMNA manufacturing and assembly facility does not contain any reference to or information regarding Chemetco.

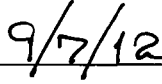
26. Gary Shultz
Vice President and General Counsel
Manufacturing Division
Mitsubishi Motors North America, Inc.
100 N. Mitsubishi Motorway
Normal, IL 61761

Dawn Perry, P.E.
Environmental Engineer
Manufacturing Division
Mitsubishi Motors North America, Inc.
100 N. Mitsubishi Motorway
Normal, IL 61761

I certify under penalty of law that this document and all enclosures were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based upon my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Gary Shultz
Vice President and General Counsel



Date